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3:17-CV-1011-YY

Opposed Motion for sanctions. Illegal wiretapping of plaintiff Samuel Wani, by Defendant George Fox University Counsel Martin William Jaqua on July, 10th, 2017. With the assistant of defendant Gorge Fox university and Pipeline Media Group/Newberg Graphics reporter Seth Gordon and use of the illegally acquired information in court proceedings.
Case No: 3:17-CV-1011-yy Wani Vs GFU, et al.

I spoke to the defense Counsel in regards to an Illegal interview that was conducted by George Fox University Counsel Martin William Jaqua on July, 10th, 2017. With the assistant of defendant George Fox University and Pipeline Media Group/Newberg Graphics reporter Seth Gordon and use of the illegally acquired information in court proceedings as per local rule 7, I attempted to confer with the counsel through emails in good faith, prior to me failing this motion, the week of 5/20/2018-5/31/2018. And the conversation resulted to name calling as always by the defense counsel.

Someone obtained my cellphone number from Mike Bujnowski (Guardian I was living with at the time when I was homeless due to being unable to work yet, due to my injury) asking to speak to me about my lawsuit that was filed on June 29th, 2017. They also obtained some personal and background information about me from Mike. On July 7th, I was contacted by someone who disguised themselves as Seth Gordon, Newberg Graphics Newspaper reporter (Pipeline Media Group) Through a text message from a weird number +17347305760 seeking information pertaining to my lawsuit. The only person at the time that had Mike Bujnowski phone number, and email that is involved in this Lawsuit was George Fox University and the only person aware of any relationship between myself and Mike Bujnowski. The person was very particularly interested in information regarding defendant Gorge Fox University and the Gorge Fox university Portion of the case and defendant Dr. Thomas Croy's portion of the case and a slight interest in Dominick- Fix Gonzalez's Portion of the case. We exchanged a few text messages and the person who "disguised themselves as Seth Gordon," started asking questions that got more and more in-depth that a reporter would not be asking and wanted to set an interview with me. I attempted to dodge the interview a few times and the person who "disguised themselves as Seth Gordon," started making threats about writing information that they had

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apparently obtained from an interaction they had earlier with Mike Bujnowski which was half truth, I agreed to do the interview to clarify the misrepresented facts pertaining to my identity, background information, where I was from and even my legal status as a resident of the united states , post Gorge Fox university schooling(they claimed they were told that I went to central, Washington university and that I graduated from central with honors and reason for my lawsuit. Here are the dates and times I was texted, (Exhibit- Text messages, from the +17347305760 number, Friday July 7th, 2017, July 8th, 2017, and Sunday July, 9th). I tried calling the number 503-538-2181 that was given to me by the person who disguised themselves as Seth Gordon, Newberg Graphics Newspaper reporter from my prepaid phone,(360-367-6048 but the call wouldn't go through), I also tried calling from the landline and the call would not go through, the person who "disguised themselves as Seth Gordon," give me this number saying that it was his girlfriend's number (503-998-5047) or mine again (734-730-5760) I tried and the call once again wouldn't go through. On Monday July 10th, 2017, the following day I went to the gym to use one of my friend's phone (4065447504) to call the person who "disguised themselves as Seth Gordon," and conduct the interview. At around 10 am-11:45 am I was interviewed on record. The interview got very in-depth and the person who "disguised themselves as Seth Gordon," started making a lot of legal arguments, and theories regarding my claims, and the defendants involved, they also started asking me about strategies about how I plan to fight my case, and how plan to stand up to professional lawyers in the litigation process of my case given that I was a self-representing and had limited understanding of the law, they also asked about how treatment in regards to my injury and names of doctors and places I was treated at. And how I plan to present it to the court. They also asked about how I would deal with evidence suppression. The interview lasted about 30-45 minutes, I was promised to receive the copy of the recording and get the preview of the facts before they were published on the upcoming article the following Wed, but I never got them". (see Exhibit emails, between me and the person who "disguised themselves as Seth Gordon,"). I kept trying to get a copy of the recording and the facts before they got published but the person who "disguised themselves as Seth Gordon," would not hand them over. Finally, I look through the Newberg graphics Newspaper a week later and there was a story regarding my lawsuit. The facts have been changed and a different narrative of what I was supposedly suing the defendant for had changed, all the facts I gave in the interview were never published. Gorge Fox University supplemented the story with a different narrative of what supposedly took place. I was portrayed as a Thug in the mug shot for a picture that was supposed to identify who I was. I took offense to how I was being portrayed and the intent behind the mug shot and threatened to sue for slander and deformation. The picture finally got change and when I did more research, the person who "disguised themselves as Seth Gordon," wasn't Seth. After seeing most of the things that were talked about in the interview resurface through the course of the litigation process on this case and court proceedings, it became clear to me that I was wire tapped by the person who "disguised themselves as Seth Gordon," and that person happens to be defendant George Fox university and the Gorge Fox university's defendants lawyer, Martin Williams Jaqua. I know his voice and the way he has conducted

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himself through this whole litigation process during phone conferrals with him, him and the rest of the defense counsel have adopted everything that was discussed in that interview and have implemented it at varies stages of the proceedings. The first implementation was trying to anger me and causing problems with the proceeding process, all the discovery disputes, 2) the new adapted approach that "We are sorry to hear that your thumb is still bothering you. We spoke to Greg Boughton and he confirmed you came to him regarding your thumb. He examined it and said it did not appear to be broken or have any torn ligaments, and appeared to be a strain. He said you never asked him about getting an x-ray and he would have said that was not a problem if it would give you peace of mind. He has never denied anyone the the ability to seek additional medical treatment and he would have no authority to do so. He spoke to Dr. Croy (as is protocol) and found out that you had gone in for an x-ray and that Dr. Croy had reviewed the x-ray, and your thumb, and also came to the conclusion that it was not broken" Counsel for Gorge Fox university tried to tell the court that it was a typo, during an in person discovery dispute hearing on Jan. 2018 and I objected and clearly pointed out that that was a lie(I have tried to point that out over 2 years now and that was not the case). 3) The counsel for defendant Thomas Croy, (Mark Sherman) after obtaining my medical records from providence, is now starting to adapt a different narrative by trying to say that Dr. Cory looked at the exact x-ray of me that was taken at providence on 9/2/2015 and that was looked at on 9/8/2015. And that Dr. Cory was the Gorge Fox university team physician and that he had privileges at providence at the time following my treatment. Which was not the case during the course of my treatment and the following two years up until they had access to my medical records through subpoenas(then counsel mark Sherman tried to present me this new adopted theory so that he could use them as affirmative defenses during a conferral and I dined the request and it was later brought up on an email on 3/19/2018 sent to the court prior to a 3/21/2018 discovery dispute hearing and a copy of my x-ray from providence was forwarded to the judge and presented using this theory. 4) as for the discovery process, I still haven't been provide with all the discoverable materials I'm entitled to under rule 26. The counsels continue to negligently conceal, withhold and with continued efforts, fabricate and present my own medical records and other documents. While the counsels are concentrating on creating a (Confirmation bias) by Cherry picking, suppressing evidence, presenting incomplete evidence of my medical records and other documents which would prove my case, they are pointing to individual evidence within my medical records or other important exhibits that seem to confirm a particular position of their affirmative defenses and arguments while ignoring a significant portion of my evidence, that may contradict their position, without me having those documents and exhibit provided to me through discovery they can better support their point while I'm not able to point out the suppressed portion due to the negligent concealment, withholding and fabrication of my evidence.

Attached are the two separate copies of the published article: Exhibit 1st newspaper; portraying me as a thug with the mug shot. Exhibit 2nd newspaper, edited mug shot of me using

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the actual copy of the same picture that was edited to make me look like a thug until I complained about it and made threats to sue.

Attached also: Exhibits text messages

Attached also: Exhibits emails

Martin William Jaqua, has been the only defense counsel that has been obsessed with calling me a (Thug, Paranoid and a drop out) repeatedly and I have kept my cool. So, I'm not surprised that I would get portrayed as a thug in the article and the only person that has shown that has been The Gorge Fox university/ George Fox university defendants, Defense Counsel Martin William Jaqua. (I recognize the voice from previous telephone conferrals, and direct implementation of the illegally obtained facts about the lawsuit) the only person with such high interest in creating a Negative Media Propaganda (presenting me as a thug and changing the narrative of the truth of what took place at George Fox University, in regards to my injury treatment and racial discrimination, bullying and harassment is defendant George Fox University). This whole article has been written to Persuade people's attitudes, beliefs and behaviors with the new narrative to produce a favorable outcome for the defendant Gorge Fox university and co-defendants.

Once the court has obtained the wiretap recording of the interview and identified who the person that "disguising themselves as Seth Gordon" is and their ties to the case, the court can impose the necessary sanctions. Counsel Martin Jaqua, Defendant Gorge Fox University can provide the recording of the interview recording to the court, Seth Gordon Newberg Graphics newspaper reporter could also provide it to the court for its investigation into the matters.

Unidentifiable Telephone Numbers Used during the wiretap scandal:

Telephone Number: +17347305760

Telephone Number: 503-998-5047

Telephone Number: 503-538-2181

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CERTIFICATE OF SERVICE

I hereby certify that on, Monday, June 4, 2018, I made service of the following document:

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By placing a copy in a first-class postage paid envelope in for
Bellevue Washington

Delivery by U.S. mail to the address (es) set forth below:

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